

EXHIBIT 3

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE JUUL LABS, INC., MARKETING,
SALES PRACTICES, AND PRODUCTS
LIABILITY LITIGATION

Case No. 19-md-02913-WHO

**DECLARATION OF CAMERON R. AZARI,
ESQ., IN SUPPORT OF CLASS
PLAINTIFFS' MOTION FOR FINAL
APPROVAL OF THE ALTRIA CLASS
SETTLEMENT AGREEMENT**

This Document Relates to:
CLASS ACTIONS

I, Cameron R. Azari, Esq., declare as follows:

1. My name is Cameron R. Azari, Esq. I have personal knowledge of the matters set forth herein, and I believe them to be true and correct.

2. I am a nationally recognized expert in the field of legal notice, and I have served as an expert in hundreds of federal and state cases involving class action notice plans.

3. I am a Senior Vice President with Epiq Class Action & Claims Solutions, Inc. ("Epiq") and the Director of Legal Notice for Hilsoft Notifications ("Hilsoft"); a firm that specializes in designing, developing, analyzing and implementing large-scale legal notification plans. Hilsoft is a business unit of Epiq. All references to Epiq within this declaration include Hilsoft Notifications.

4. This declaration will provide settlement administration statistics following the successful completion of the Settlement Notice Plan ("Notice Plan") regarding the Altria Class Settlement Agreement¹ in *In re JUUL Labs, Inc. Marketing, Sales Practices, and Products Liability Litigation*, No. 19-md-02913-WHO, in the United States District Court for the Northern District of

¹ As used in this Declaration, capitalized terms shall have the definitions and meanings ascribed to them in the Altria Class Settlement Agreement attached as Exhibit 1 to the Declaration of Dena C. Sharp, or such definitions and meanings as are accorded to them elsewhere in this Declaration.

1 California (the “Action”).

2 **SUMMARY OF ALTRIA NOTICE PLAN IMPLEMENTATION**

3 5. Federal Rule of Civil Procedure, Rule 23 directs that notice must be “the best notice
4 that is practicable under the circumstances, including individual notice to all members who can be
5 identified through reasonable effort” and that “[t]he notice may be by one or more of the following:
6 United States mail, electronic means, or other appropriate means.”² The Notice Plan here satisfied
7 these requirements.

8 6. The Notice Plan was designed to reach the greatest practicable number of identified
9 Class Members. As expected, the reach of the Notice Plan exceeded 80% to the identified Class
10 Members. This reach percentage is calculated by combining the Individual Notice effort with the
11 extensive online Media Notice (while accounting for duplication across the various forms of
12 notice). The reach was further enhanced by a press release, sponsored search, and a case website.
13 Further information regarding implementation and preliminary results of the Altria Settlement
14 Notice is provided below. I will provide a supplemental Declaration to the Court prior to the Final
15 Approval Hearing to provide updated information regarding any requests for exclusion and/or
16 objections and updated settlement administration statistics.

17 **PREVIOUS DECLARATIONS IN THIS ACTION**

18 7. For the related settlement with JUUL in this same litigation, I previously executed
19 several declarations that are filed with the Court. For the Altria Settlement, I executed my
20 *Declaration of Cameron R. Azari, Esq., in Support of Motion for Preliminary Approval of the Altria*
21 *Class Settlement* (“Altria Notice Plan Declaration”) on July 26, 2023, ECF No. 4082-16, which
22 described the proposed Settlement Notice Plan and the proposed claim process regarding the Altria
23 Class Settlement Agreement. Subsequently, I executed my *Declaration of Cameron R. Azari, Esq.,*
24 *Regarding Altria Settlement Notice Plan Completion* (“Altria Notice Completion Declaration”) on
25 December 5, 2023, ECF No. 4166 which reported the successful implementation of the Settlement
26 Notice Plan (“Notice Plan”) and provided settlement administration statistics to date.

27 _____
28 ² Fed. R. Civ. P. 23(c)(2)(B).

8. This declaration will provide updated notice and claims administration statistics. The facts in this declaration are based on my personal knowledge, as well as information provided to me by my colleagues in the ordinary course of my business at Epiq.

CAFA NOTICE

9. On August 4, 2023, Epiq sent 58 CAFA Notice Packages (“CAFA Notice”) on behalf of Defendant(s) Altria Group, Inc., Philip Morris USA, Inc., Altria Client Services LLC, Altria Enterprises LLC, and Altria Group Distribution, as required by the federal Class Action Fairness Act of 2005 (CAFA), 28 U.S.C. § 1715. The CAFA Notice was sent via United States Postal Service (“USPS”) Certified Mail to 55 officials, which included the Attorneys General of 49 states, the District of Columbia, and the United States Territories. The CAFA Notice was also sent via United Parcel Service (“UPS”) to the Attorney General of the United States and the Food and Drug Administration. Details regarding the CAFA Notice mailing are provided in the *Declaration of Kyle S. Bingham, on Implementation of CAFA Notice*, dated August 4, 2023, which is included as **Attachment 1**.

10. To date, no entities sent the CAFA notice have sought to intervene in the litigation or have raised any concerns or objections to the Settlement.

SETTLEMENT NOTICE PLAN IMPLEMENTATION SUMMARY

Individual Notice

11. As detailed in my Notice Completion Declaration, from October 9, 2023, through November 1, 2023, Epiq sent 8,312,007 Email Notices to all identified Class Members for whom a valid email address was available. The population of identified Class Members includes individuals with direct purchases from JLI and individuals who identified themselves by filing a claim or opt out request in connection with the JLI Class Settlement. Subsequently, on November 6, 2023, Epiq sent 152,258 Double Postcard Notices with a Claim Form with prepaid return postage on the Claim Form (“Postcard Notice”). The Notices were sent via USPS first-class mail to all identified Class Members (with known purchases of JUUL products), and an associated physical address to whom a valid email address was not available or undeliverable after multiple attempts. The Email and

Postcard Notice provided a simplified manner for submitting a prepopulated claim form for those individuals that had not already submitted a claim in the prior JLI Settlement.

12. As of January 12, 2024, for Postcard Notices that were returned as undeliverable, Epiq re-mailed 14,554 Postcard Notices to any new address available through USPS information and to any new addresses Epiq obtained from a third-party address lookup service.

13. Class Members were also given the option to request via a toll-free telephone number or by mail that a Long Form Notice and Claim Form be mailed to them. As of January 12, 2024, Epiq had mailed 93 Long Form Notices and Claim Forms as a result of those requests.

Media Plan

14. The Media Plan as outlined in my Notice Plan Declaration was successfully completed on December 6, 2023. The Media Plan supplemented the Individual Notices and included a Digital Notice campaign, Sponsored Search Listing, and an informational release. The Media Plan ran for 59 days, from October 9, 2023, through December 6, 2023. The Individual Notice and Media Notice were supplemented with an Informational Release, which ran over *PR Newswire* and *Uwire* on October 9, 2023. Combined, approximately 409,315,597 impressions were generated by the Digital Notices, nationwide.

15. More details regarding the target audiences, distribution, and specific ad type of the Digital Notices and Video Notices are included in the following table:

<i>Network/Property</i>	<i>Target</i>	<i>Distribution</i>	<i>Ad Type</i>	<i>Delivered Impressions</i>
<i>Google Display Network</i>	Age 15+	National	Banner Notices	16,808,048
<i>Google Display Network</i>	Age 15+ Spanish	National	Banner Notices	4,537,295
<i>Google Display Network</i>	Data Match Targeting of JUUL email records	National	Banner Notices	10,592,169
<i>Google Display Network</i>	Parents with Minor Children	National	Banner Notices	8,742,896
<i>Google Display Network</i>	Parents with Minor Children - Spanish	National	Banner Notices	2,050,779
<i>Google Display Network</i>	Custom Intent: Electronic Cigarette	National	Banner Notices	19,247,926
<i>Google Display Network</i>	Custom Intent: Electronic Cigarette - Spanish	National	Banner Notices	4,741,073

<i>Network/Property</i>	<i>Target</i>	<i>Distribution</i>	<i>Ad Type</i>	<i>Delivered Impressions</i>
<i>Google Display Network</i>	Custom Affinity: Electronic Cigarette	National	Banner Notices	20,419,455
<i>Google Display Network</i>	Custom Affinity: Electronic Cigarette - Spanish	National	Banner Notices	5,033,731
<i>Google Display Network</i>	Contextual Target: JUUL	National	Banner Notices	21,010,060
<i>Google Display Network</i>	Contextual Target: JUUL - Spanish	National	Banner Notices	5,315,551
<i>Facebook</i>	Age 15+	National	Newsfeed & Right Hand Column	13,102,155
<i>Facebook</i>	Age 15+ Spanish	National	Newsfeed & Right Hand Column	3,122,131
<i>Facebook</i>	Data Match Targeting of JUUL email records	National	Newsfeed & Right Hand Column	10,337,532
<i>Facebook</i>	Parents with Minor Children	National	Newsfeed & Right Hand Column	8,282,515
<i>Facebook</i>	Parents with Minor Children - Spanish	National	Newsfeed & Right Hand Column	2,133,679
<i>Facebook</i>	Interest: Electronic Cigarette and/or Smoking	National	Newsfeed & Right Hand Column	25,046,234
<i>Facebook</i>	Interest: Electronic Cigarette and/or Smoking - Spanish	National	Newsfeed & Right Hand Column	6,359,251
<i>Instagram</i>	Age 15+	National	Newsfeed	3,038,600
<i>Instagram</i>	Age 15+ Spanish	National	Newsfeed	814,092
<i>Instagram</i>	Age 15+	National	Instagram Reel (Video) Ads	26,906,063
<i>Instagram</i>	Data Match Targeting of JUUL email records	National	Newsfeed	2,526,959
<i>Instagram</i>	Parents with Minor Children	National	Newsfeed	1,527,111
<i>Instagram</i>	Parents with Minor Children - Spanish	National	Newsfeed	382,296
<i>Instagram</i>	Interest: Electronic Cigarette and/or Smoking	National	Newsfeed	5,057,824
<i>Instagram</i>	Interest: Electronic Cigarette and/or Smoking - Spanish	National	Newsfeed	1,341,843
<i>SnapChat</i>	Age 15+	National	Video Ad	22,376,778
<i>TikTok</i>	Age 15+	National	Video Ad	42,174,193
<i>Twitter</i>	Age 15+	National	Twitter Feed Ads	21,125,820

<i>Network/Property</i>	<i>Target</i>	<i>Distribution</i>	<i>Ad Type</i>	<i>Delivered Impressions</i>
<i>Twitter</i>	Data Match Targeting of JUUL email records	National	Twitter Feed Ads	10,122,098
<i>Twitter</i>	Interest: Electronic Cigarette and/or Smoking	National	Twitter Feed Ads	35,039,562
<i>YouTube</i>	Age 15+	National	YouTube Pre-Roll Ads (30 seconds)	7,397,846
<i>YouTube</i>	Parents with Minor Children	National	YouTube Pre-Roll Ads (30 seconds)	2,540,727
<i>YouTube</i>	Custom Intent: Electronic Cigarette	National	YouTube Pre-Roll Ads (30 seconds)	6,210,956
<i>YouTube</i>	Custom Affinity: Electronic Cigarette	National	YouTube Pre-Roll Ads (30 seconds)	6,304,864
<i>YouTube</i>	Contextual Target: JUUL	National	YouTube Pre-Roll Ads (30 seconds)	3,631,101
<i>Telegram</i>	Target: Apple Music	National	Telegram Pre-Roll Ads (30 seconds)	4,147,109
<i>Telegram</i>	Targets: Billboard Charts, Movies and/or Movie Reviews	National	Telegram Ad Post	4,170,399
<i>Reddit</i>	Age 15+	National	Reddit Feed Ads	5,348,169
<i>Reddit</i>	/r/JUUL, r/Vaping and/or /r/eCigarette	National	Reddit Feed Ads	10,248,707
TOTAL				409,315,597

Case Website, Toll-free Telephone Number and Postal Mailing Address

16. On March 15, 2023, a case website (www.JuulClassAction.com) and a toll-free telephone number (1-855-604-1734) were established for the Juul Settlement to allow Class Members to obtain additional information about the Settlement. On October 6, 2023, the case website and toll-free telephone number messaging were updated to add information regarding the Altria Settlement. The existing postal mailing address and email address established for the Juul Settlement, continue to be available for the Altria Settlement allowing Class Members to request additional information or ask questions via these channels.

17. As of January 12, 2024, there have been 9,861,900 unique visitor sessions to the case website, and 52,742,013 web pages have been presented. There have been 247 calls to the toll-free telephone number representing 1,499 minutes of use, and service agents had handled 146 incoming calls representing 1,343 minutes of use.

Requests for Exclusion and Objections

18. The deadline to request exclusion from the Settlement or to object to the Settlement is February 5, 2024. As of January 12, 2024, Epiq has received 179 requests for exclusion and no objections to the Settlement.

Claim Submissions

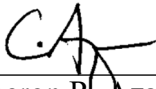
19. The deadline for Class Members to file a Claim Form for the Altria Settlement is not until February 5, 2024. As of January 12, 2024, Epiq had received 7,288,999 Claims (7,288,562 online and 437 paper). Since the February 5, 2024, claim filing deadline has not yet passed, these numbers are preliminary. By that deadline, I expect a significant number of additional claims will have been filed by Class Members. As standard practice, Epiq is in the process of conducting a complete review and audit of all Claim Forms received. There is a likelihood that after detailed review, the total number of Claim Forms received will change due to duplicate and denied Claim Forms.

CONCLUSION

20. The Settlement Notice Plan provided the best notice practicable under the circumstances of this case, conformed to all aspects of Federal Rule of Civil Procedure 23, comported with the guidance for effective notice articulated in the Manual for Complex Litigation 4th Ed, and was consistent with the Federal Judicial Center's Judges' Class Action Notice and Claims Process Checklist and Plain Language Guide (2010). As stated above, the reach of the Notice Plan exceeded 80% of the identified Settlement Class. The Notice Plan was based on the successful notice plan implemented in the prior JLI Settlement and was reviewed and analyzed during its implementation to ensure it met the requisite due process requirements.

21. Prior to the Final Approval Hearing and consistent with the schedule established by the Court, I will provide a supplemental Declaration to the Court, which will include a recap of all notice implementation details, up-to-date notice and settlement administration statistics, a report on any opt-outs received, and will address any objections received that may relate to the Settlement Notice Plan.

1 I declare under penalty of perjury that the foregoing is true and correct. Executed on January
2 12, 2024.

3
4 
5 _____
6 Cameron R. Azari, Esq.

Attachment 1

IN RE: JUUL LABS, INC. MARKETING
SALES PRACTICES, AND PRODUCTS
LIABILITY LITIGATION

THIS DOCUMENT RELATES TO:
CLASS ACTIONS

I, KYLE S. BINGHAM, hereby declare and state as follows:

2. I am the Director of Legal Noticing for Epiq Class Action & Claims Solutions, Inc. (“Epiq”), a firm that specializes in designing, developing, analyzing and implementing large-scale, unbiased, legal notification plans. I have overseen and handled Class Action Fairness Act (“CAFA”) notice mailings for more than 400 class action settlements.

4. The facts in this Declaration are based on what I personally know, as well as information provided to me in the ordinary course of my business by my colleagues at Epiq.

CAFA NOTICE IMPLEMENTATION

5. At the direction of counsel for Defendant(s) Altria Group, Inc., Philip Morris USA, Inc., Altria Client Services LLC, Altria Enterprises LLC, and Altria Group Distribution, 58 federal and state officials (the Attorney General of the United States, the Food and Drug Administration, and the Attorneys General of each of the 50 states, the District of Columbia, and the United States Territories) were identified to receive CAFA notice.

6. Epiq maintains a list of these federal and state officials with contact information for the purpose of providing CAFA notice. Prior to mailing, the names and addresses selected from Epiq's list were verified, then run through the Coding Accuracy Support System ("CASS") maintained by the United States Postal Service ("USPS").¹

7. On August 4, 2023, Epiq sent 58 CAFA Notice Packages ("Notice"). The Notice was mailed via USPS Certified Mail to 55 officials (the Attorneys General of 49 states, the District of Columbia, and the United States Territories). As per the direction of the Office of the Nevada Attorney General, the Notice was sent to the Nevada Attorney General electronically via email. The Notice was also sent via United Parcel Service ("UPS") to the Attorney General of the United States and the Food and Drug Administration. The CAFA Notice Service List (USPS Certified Mail, Email, and UPS) is included as **Attachment 1**.

8. The materials sent to the federal and state officials included a Cover Letter, which provided notice of the proposed Settlement of the above-captioned case. The Cover Letter is included as **Attachment 2**.

9. The cover letter was accompanied by a CD, which included the following:

¹ CASS improves the accuracy of carrier route, 5-digit ZIP®, ZIP + 4® and delivery point codes that appear on mail pieces. The USPS makes this system available to mailing firms who want to improve the accuracy of postal codes, i.e., 5-digit ZIP®, ZIP + 4®, delivery point (DPCs), and carrier route codes that appear on mail pieces.

- 1 a. **Per 28 U.S.C. § 1715(b)(1) – Complaint and Any Amended Complaints:**
- 2 • Consolidated Class Action Complaint (filed March 11, 2020);
- 3 • Amended Consolidated Class Action Complaint (filed June 18, 2020);
- 4 and
- 5 • Second Amended Consolidated Class Action Complaint (filed November
- 6 13, 2020).
- 7 b. **Per 28 U.S.C. § 1715(b)(3) – Notification to Class Members:**
- 8 • Class Action Notice (*Exhibit 3 to the Class Settlement Agreement*);
- 9 • Postcard Notice (*Exhibit 4 to the Class Settlement Agreement*);
- 10 • Email Notice (*Exhibit 5 to the Class Settlement Agreement*);
- 11 • Email Notice (*Exhibit 6 to the Class Settlement Agreement*);
- 12 • Phone Script (*Exhibit 7 to the Class Settlement Agreement*);
- 13 • Claim Form (*Exhibit 8 to the Class Settlement Agreement*);
- 14 • Banner Advertisement (*Exhibit 9 to the Class Settlement Agreement*);
- 15 • Video Script (*Exhibit 10 to the Class Settlement Agreement*); and
- 16 • Press Release (*Exhibit 11 to the Class Settlement Agreement*).
- 17
- 18 c. **Per 28 U.S.C. § 1715(b)(4) – Class Action Settlement Agreement:** The
- 19 following documents were included:
- 20 • Class Settlement Agreement.
- 21
- 22 d. **Per 28 U.S.C. § 1715(b)(7) – Estimate of Class Members:** A Class Member
- Geographic Location Report.

23 I declare under penalty of perjury that the foregoing is true and correct. Executed on

24 August 4, 2023.

25

26 

27 Kyle S. Bingham

Attachment 1

CAFA Notice Service List

USPS Certified Mail

Company	FullName	Address1	Address2	City	State	Zip
Office of the Attorney General	Treg Taylor	1031 W 4th Ave	Suite 200	Anchorage	AK	99501
Office of the Attorney General	Steve Marshall	501 Washington Ave		Montgomery	AL	36104
Office of the Attorney General	Tim Griffin	323 Center St	Suite 200	Little Rock	AR	72201
Office of the Attorney General	Kris Mayes	2005 N Central Ave		Phoenix	AZ	85004
Office of the Attorney General	CAFA Coordinator	Consumer Protection Section	455 Golden Gate Ave Suite 11000	San Francisco	CA	94102
Office of the Attorney General	Phil Weiser	Ralph L Carr Colorado Judicial Center	1300 Broadway Fl 10	Denver	CO	80203
Office of the Attorney General	William Tong	165 Capitol Ave		Hartford	CT	06106
Office of the Attorney General	Brian Schwalb	400 6th St NW		Washington	DC	20001
Office of the Attorney General	Kathy Jennings	Carvel State Bldg	820 N French St	Wilmington	DE	19801
Office of the Attorney General	Ashley Moody	State of Florida	The Capitol PL-01	Tallahassee	FL	32399
Office of the Attorney General	Chris Carr	40 Capitol Square SW		Atlanta	GA	30334
Department of the Attorney General	Anne E Lopez	425 Queen St		Honolulu	HI	96813
Iowa Attorney General	Brenna Bird	Hoover State Office Building	1305 E Walnut St	Des Moines	IA	50319
Office of the Attorney General	Raul Labrador	700 W Jefferson St Ste 210	PO Box 83720	Boise	ID	83720
Office of the Attorney General	Kwame Raoul	100 W Randolph St		Chicago	IL	60601
Office of the Indiana Attorney General	Todd Rokita	Indiana Government Center South	302 W Washington St Rm 5	Indianapolis	IN	46204
Office of the Attorney General	Kris Kobach	120 SW 10th Ave 2nd Fl		Topeka	KS	66612
Office of the Attorney General	Daniel Cameron	700 Capitol Ave Suite 118		Frankfort	KY	40601
Office of the Attorney General	Jeff Landry	PO Box 94005		Baton Rouge	LA	70804
Office of the Attorney General	Andrea Campbell	1 Ashburton Pl 20th Fl		Boston	MA	02108
Office of the Attorney General	Anthony G Brown	200 St Paul Pl		Baltimore	MD	21202
Office of the Attorney General	Aaron Frey	6 State House Station		Augusta	ME	04333
Department of Attorney General	Dana Nessel	PO BOX 30212		Lansing	MI	48909
Office of the Attorney General	Keith Ellison	445 Minnesota St Ste 1400		St Paul	MN	55101
Missouri Attorney General's Office	Andrew Bailey	207 West High Street	PO Box 899	Jefferson City	MO	65102
Mississippi Attorney General	Lynn Fitch	PO Box 220		Jackson	MS	39205
Office of the Attorney General	Austin Knudsen	215 N Sanders 3rd Fl	PO Box 201401	Helena	MT	59620
Attorney General's Office	Josh Stein	9001 Mail Service Ctr		Raleigh	NC	27699
Office of the Attorney General	Drew H Wrigley	600 E Boulevard Ave Dept 125		Bismarck	ND	58505
Nebraska Attorney General	Mike Hilgers	2115 State Capitol	PO Box 98920	Lincoln	NE	68509
Office of the Attorney General	John Formella	NH Department of Justice	33 Capitol St	Concord	NH	03301
Office of the Attorney General	Matthew J Platkin	25 Market Street	PO Box 080	Trenton	NJ	08625
Office of the Attorney General	Raul Torrez	408 Galisteo St	Villagra Bldg	Santa Fe	NM	87501
Office of the Attorney General	CAFA Coordinator	28 Liberty Street 15th Floor		New York	NY	10005
Office of the Attorney General	Dave Yost	30 E Broad St Fl 14		Columbus	OH	43215
Office of the Attorney General	Gentner Drummond	313 NE 21st St		Oklahoma City	OK	73105
Office of the Attorney General	Ellen F Rosenblum	Oregon Department of Justice	1162 Court St NE	Salem	OR	97301
Office of the Attorney General	Michelle A. Henry	16th Fl Strawberry Square		Harrisburg	PA	17120
Office of the Attorney General	Peter F Neronha	150 S Main St		Providence	RI	02903
Office of the Attorney General	Alan Wilson	PO Box 11549		Columbia	SC	29211
Office of the Attorney General	Marty Jackley	1302 E Hwy 14 Ste 1		Pierre	SD	57501
Office of the Attorney General	Jonathan Skrmetti	PO Box 20207		Nashville	TN	37202
Office of the Attorney General	Ken Paxton	PO Box 12548		Austin	TX	78711
Office of the Attorney General	Sean D Reyes	PO Box 142320		Salt Lake City	UT	84114
Office of the Attorney General	Jason S Miyares	202 N 9th St		Richmond	VA	23219
Office of the Attorney General	Charity R Clark	109 State St		Montpelier	VT	05609
Office of the Attorney General	Bob Ferguson	800 5th Ave Ste 2000		Seattle	WA	98104
Office of the Attorney General	Josh Kaul	PO Box 7857		Madison	WI	53707
Office of the Attorney General	Patrick Morrisey	State Capitol Complex Bldg 1 Room E 26	1900 Kanawha Blvd E	Charleston	WV	25305
Office of the Attorney General	Bridget Hill	109 State Capital		Cheyenne	WY	82002
Department of Legal Affairs	Fainu'ulei Falefatu Ala'ilima-Utu	American Samoa Gov't Exec Ofc Bldg Utulei	Territory of American Samoa	Pago Pago	AS	96799
Attorney General Office of Guam	Douglas Moylan	Administrative Division	590 S Marine Corps Dr Ste 901	Tamuning	GU	96913
Office of the Attorney General	Edward Manibusan	Administration Bldg	PO Box 10007	Saipan	MP	96950
PR Department of Justice	Domingo Emanuelli Hernández	PO Box 9020192		San Juan	PR	00902
Department of Justice	Ariel K Smith	3438 Kronprindsens Gade Ste 2	GERS BLDG	St Thomas	VI	00802

Email

Company	Contact Format	State
Office of the Attorney General for Nevada	All documents sent to NV AG at their dedicated CAFA email inbox.	NV

CAFA Notice Service List

UPS

Company	FullName	Address1	Address2	City	State	Zip
US Department of Justice	Merrick B. Garland	950 Pennsylvania Ave NW		Washington	DC	20530
Food and Drug Administration	Chief Counsel Mark Raza	10903 New Hampshire Ave	White Oak Building 31, Rm 4536	Silver Spring	MD	20993

Attachment 2

CAFA NOTICE ADMINISTRATOR

HILSOFT NOTIFICATIONS
10300 SW Allen Blvd
Beaverton, OR 97005
P 503-350-5800
DL-CAFA@epiqglobal.com

August 4, 2023

VIA UPS OR USPS CERTIFIED MAIL

Class Action Fairness Act – Notice to Federal and State Officials

Dear Federal and State Officials:

Pursuant to the Class Action Fairness Act of 2005 (“CAFA”), codified at 28 U.S.C. § 1715, please find enclosed information from Defendants Altria Group, Inc., Philip Morris USA, Inc., Altria Client Services LLC, Altria Enterprises LLC, and Altria Group Distribution Company relating to the proposed settlement of a class action lawsuit.

- **Case:** *In Re Juul Labs, Inc. Marketing, Sales Practices, and Products Liability Litigation*, Case No. 3:19-md-02913-WHO.
- **Court:** United States District Court for the Northern District of California.
- **Defendants:** Altria Group, Inc., Philip Morris USA, Inc., Altria Client Services LLC, Altria Enterprises LLC, and Altria Group Distribution Company.
- **Documents Enclosed:** In accordance with the requirements of 28 U.S.C. § 1715, please find copies of the following documents associated with this action on the enclosed CD:

1. Per 28 U.S.C. § 1715(b)(1) – Complaint and Any Amended Complaints:

- a. Consolidated Class Action Complaint (filed March 11, 2020);
- b. Amended Consolidated Class Action Complaint (filed June 18, 2020); and
- c. Second Amended Consolidated Class Action Complaint (filed November 13, 2020).

2. Per 28 U.S.C. § 1715(b)(2) – Notice of Any Scheduled Judicial Hearing: The Court has not scheduled a preliminary approval hearing or a final approval hearing or any other judicial hearing concerning the settlement agreement at this time.

3. Per 28 U.S.C. § 1715(b)(3) – Notification to Class Members:

- a. Class Action Notice (*Exhibit 3 to the Class Settlement Agreement*);
- b. Postcard Notice (*Exhibit 4 to the Class Settlement Agreement*);
- c. Email Notice (*Exhibit 5 to the Class Settlement Agreement*);
- d. Email Notice (*Exhibit 6 to the Class Settlement Agreement*);

CAFA NOTICE ADMINISTRATOR

HILSOFT NOTIFICATIONS
10300 SW Allen Blvd
Beaverton, OR 97005
P 503-350-5800
DL-CAFA@epiqglobal.com

- e. Phone Script (*Exhibit 7 to the Class Settlement Agreement*);
 - f. Claim Form (*Exhibit 8 to the Class Settlement Agreement*);
 - g. Banner Advertisement (*Exhibit 9 to the Class Settlement Agreement*);
 - h. Video Script (*Exhibit 10 to the Class Settlement Agreement*); and
 - i. Press Release (*Exhibit 11 to the Class Settlement Agreement*).
4. **Per 28 U.S.C. § 1715(b)(4) – Class Action Settlement Agreement:** The following documents are included:
- Class Settlement Agreement.
5. **Per 28 U.S.C. § 1715(b)(5) – Any Settlement or Other Agreements:** There are no other Settlements or Agreements between the parties.
6. **Per 28 U.S.C. § 1715(b)(6) – Final Judgment or Notice of Dismissal:** To date, the Court has not issued a final order, judgment or dismissal in the above-referenced action.
7. **Per 28 U.S.C. § 1715(b)(7) – Estimate of Class Members:** As of the date of this CAFA Notice, the Settling Defendants do not know and cannot feasibly determine the names of all individual Settlement Class members and/or the state in which each Settlement Class member resides. Although some Settlement Class members are individuals who purchased a JUUL Product directly from JLI, many others purchased JUUL Products from third-party retailers. However, a Class Member Geographic Location Report is included and represents an estimate of the known potential Settlement Class members based on data that is currently available to Defendants for some Settlement Class members, as of the date of this CAFA Notice.
8. **28 U.S.C. § 1715(b)(8) – Judicial Opinions Related to the Settlement:** To date, the Court has not issued a final order or judgment in the above-referenced action.

If you have questions or concerns about this notice or the enclosed materials, please contact this office.

Sincerely,

CAFA Notice Administrator

Enclosures